REMARKS

Amendment to the title

In section 2 of the Action, the Examiner objects to the title as not being descriptive. The original title has accordingly been replaced by the following title: "METHOD AND APPARATUS FOR ACCESSING A CONTENT SITE WITH A SOUND SEQUENCE".

Amendment to the specification

In section 3 of the Action, the Examiner asks that in page 6, line 8 of the specification, the word "Names" be appropriately corrected. Accordingly, the word "Names" has been replaced by the word "Identifiers". This correction is supported by the "RFC 1630" document (available at http://www.faqs.org/rfcs/rfc1630.html). The word "Indicators", suggested by the Examiner, seems to be of far less common use than the word "Identifier".

Amendments to the claims

Claims 1 and 14 have been amended to recite that the other group of characters comprises the address of the service system. Claim 33 has been amended to recite that the character sequence comprises a site code and a service-system address. These amendments are supported by the specification, in particular Fig. 5 and the corresponding part of the specification. No new matter has been added.

Objections to the claims

Claims 5, 7, 8 and 18 stand objected to because of improper dependency and claim 18 also stands objected to for comprising the word "RI". In compliance with the Examiner's suggestions, claims 5 and 8 now depend on claim 1, whereas claim 7

depends on claim 8 and claim 18 depends on claim 14. The word "RI" of claim 18 has been corrected into URI. This correction is supported by the originally filed claim 18.

Rejection under 35 U.S.C §103

Claims 1, 5-14 and 18-49 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Pat. No. 6,061,738 to Osaku et al. The Applicant respectfully disagrees.

Rejection of claims 1 and 14

In section 6 of the Action, the Examiner states that Osaku discloses "receiving a search request at a server in which there are two group of characters (URL1 and a simplified network address, or SNA)", and asserts that "it would have been obvious to one of ordinary skill in the art to modify Osaku et al. to include two groups of characters in the sound sequence signal" entered by a user.

Osaku is directed at "accessing a network URL through pre-assigned, simplified network addresses" (column 2, line 67 – column 3, line 1) and at avoiding the need to input an URL to a computer, a process which "presents unexpected difficulties because it requires computer inputting of the URL alphabetical characters which are usually in a long and complex character string" (column 1, lines 39-42). In Osaku, the user enters a SNA in a client and the client adds an URL to the SNA (column 8 lines 28-37). Thus, Osaku allows a user to avoid entering an URL.

The inclusion of the two groups of characters (SNA and URL) in the signal entered by the user, as suggested by the Examiner, would mean including an URL in a signal entered by a user, and would therefore go against the very teachings of Osaku. Not only does Osaku not suggest such an inclusion, it teaches away from such an inclusion.

The Applicant acknowledges that Osaku teaches imputing the SNA as a sequence of musical tones to "detect an input error through hearing". However, the Applicant submits that nowhere does Osaku teach that entering an URL is difficult because input errors are difficult to detect. Osaku teaches that entering an URL is

difficult because *"it is difficult to <u>remember</u> these <u>long and complex character strings,</u> particularly when it is necessary to <u>distinguish uppercase letters from lowercase letters</u>"* (column 1, lines 42-44). The Applicant submits that the Examiner fails to show how Osaku discloses or suggests that detecting input errors would solve the above-recited problems, to thereby provide the requisite motivation for modifying Osaku as suggested by the Examiner.

The Examiner states that the suggested inclusion would allow the user to specify which server to search. However, the Applicant submits that since, as seen above, the very purpose of the server of Osaku is to avoid the user imputing an URL, asking the user to input an URL to specify said server would negate the teachings of Osaku.

For the above reasons at least, the Applicant submits that Osaku teaches away from using "a sound sequence with sound features that encode a character sequence according to a predetermined scheme, the character sequence comprising two groups of characters, one of which is a site code intended to be translated to a content-site URI by a remote service system and the other of which comprises the address of the service system" as recited in claim 1 or 14, and that claims 1 and 14 are patentable over Osaku.

Rejection of claim 33

The above arguments with regard to claims 1 and 14 can also be used to show that Osaku teaches away from using "sound features that encode a character sequence comprising a site code and a service-system address" as recited in claim 33. The Applicant submits that at least in view of the above reason, claim 33 is patentable over Osaku.

Rejection of claims 5-13, 18-32 and 34-39

Claims 5-13 depend directly or indirectly on claim 1, claims 15-27 depend directly or indirectly on claim 14, claims 28-30 depend directly on claim 1, claims 31-32 depend directly on claim 14, and claims 34-36 depend directly on claim 33. The

Applicant submits that claims 5-13, 18-32 and 34-36 are patentable over Osaku at least in view of their dependency. Claims 37-39 have been canceled.

New claims

Claims 40–43 have been added. Claim 40 is an independent method claim corresponding to independent equipment claim 33. Claims 41-43 depend on claim 40. No new matter has been added. The above arguments with regard to claims 1 and 14 can also be used to show that Osaku teaches away from using "sound features that encode a character sequence according to a predetermined scheme, the character sequence comprising a service-system address and a site code indicative of said content site" as recited in claim 40. The Applicant submits that claim 40 is patentable over Osaku at least in view of the above reason, and that claims 41-43 are patentable over Osaku at least in view of their dependency.

Related Patent Application

The Applicant whishes to draw the attention of the Examiner to U.S. patent application number 10/005,377 to the same assignee, for "SOUND LINK TRANSLATION", and submits that the pending claims are patentable over that application.

In view of the above, the Applicant submits that the application is now in condition for allowance and respectfully urges the Examiner to pass this case to issue.

The Commissioner is authorized to charge any additional fees that may be required or credit overpayment to deposit account no. 08-2025. In particular, if this response is not timely filed, the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136(a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 08-2025.
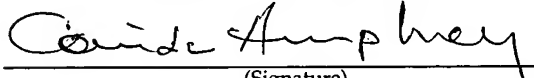
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Corinda Humphrey
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